

**STATE OF IOWA
BEFORE THE IOWA UTILITIES BOARD**

IN RE:)	
)	DOCKET NO. INU-2021-0001
INVESTIGATION INTO A)	
COMPREHENSIVE PLAN FOR)	
IOWA’S TRANSMISSION GRID)	
OF THE FUTURE)	

POST-WORKSHOP COMMENTS

Environmental Law & Policy Center (“ELPC”) and Iowa Environmental Council (“IEC”) provide these Post-Workshop Comments in response to the “Order on Workshop Agenda” (“Order”) issued by the Iowa Utilities Board (“Board”) on August 25, 2021, in docket number INU-2021-0001.

ELPC and IEC continue to believe that there is value in ensuring the existing regional transmission planning processes properly account for long-term transmission needs and opportunities for advanced transmission technologies where appropriate. The comments below address the intersection of generation planning and transmission planning that arose during the workshop on August 30, 2021.

During the workshop on August 30, 2021, Board Chair Huser specifically requested that MidAmerican share what generation MidAmerican has planned in the next five years as well as shorter term increments such as the next year and/or two years. MidAmerican claimed that it did not have a long-term planning process, but instead evaluated generation projects on a case-by-case basis. MidAmerican also refused to commit to sharing any of its generation planning with the Board as part of this docket or any other proceeding. ELPC and IEC believe that this information

is appropriate for the Board as the regulator to request and that the information will better inform the Board's exercise of its role and jurisdiction in the context of transmission and generation planning.

Iowa does not have a statutory requirement for the kind of integrated resource planning for electric generation that rate-regulated utilities must undertake in many other states. Instead, the resource planning process is intended to be addressed through other regulatory dockets. This has meant that there has not been robust and comprehensive planning subject to public discussion and review through a contested case proceeding even during a period of rapid generation cost shifts.¹ Transparency about the future generation plans of Iowa's investor-owned utilities is a reasonable expectation that would allow the Board to weigh in at the RTO level in a more informed manner and determine how best its jurisdiction over routing and siting of transmission should be exercised to ensure affordable and reliable service is efficiently maintained during this period of transition.

ELPC and IEC recommend additional planning for the generation of investor-owned utilities. Information regarding plans for generation expansion from rate-regulated utilities in Iowa would, at a minimum, inform future transmission needs. Based on the Board's and MidAmerican's statements during the workshop regarding future expansion of electric generation, that information is not available to the Board or others outside MidAmerican right now.

MidAmerican further stated that it does not have the type of long-term resource plan the Board requested because decisions are made on a case-by-case basis. Lacking such plans would make MidAmerican a clear outlier in the sector. It stretches credulity to suggest that MidAmerican does not engage in any long-range planning. At a minimum, any responsible utility would engage

¹ Recently, IPL went through a voluntary resource planning process as a result of a settlement in RPU-2019-0001. This planning process was useful and has helped IPL make better generation decisions, but it still fell short of a robust public planning process that would occur in a contested case proceeding.

in long-range planning to ensure continued ability to meet customer demand and reliability, and new generation needs would definitely be identified and addressed in that context. We recognize that there have been significant benefits to Iowa ratepayers and the Iowa economy from adding cost-effective renewable generation opportunistically on a case-by-case basis as has been done in recent history. Iowa policy encourages and it is still possible for Iowa utilities to take advantage of new or unanticipated opportunities for cost-effective renewable generation while being transparent about long-term resource planning. In addition, MidAmerican has indicated in other forums that it does have long-term plans for its coal plants, at least in broad strokes. For example, at an investor presentation in May 2021, Berkshire Hathaway Energy Chairman Greg Abel indicated that all coal power plants in Iowa will retire by 2049, but none would retire before 2031.² ELPC and IEC are not aware of this information and the assumptions and inputs used to arrive at these statements being presented to the Board, but it is likely relevant for generation and transmission planning.

ELPC and IEC encourage further efforts by the Board in this or other appropriate dockets to bring greater transparency to and development of generation resource planning for Iowa's rate-regulated utilities that will save customers money while also facilitating the transition to renewable energy. More transparent and effective generation planning will inform the Board's effective exercise of its jurisdiction, its participation in regional transmission planning efforts, and the facilitation of alternative transmission technology.

Respectfully submitted,

² "Berkshire Hathaway 2021 Annual Meeting Livestream," Yahoo Finance, at 1:56:30, available at <https://finance.yahoo.com/BRKlivestream/?guccounter=1>.

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